

HOGAN LOVELLS LLP
Michael J. Shepard (Ca Bar No. 91281)
3 Embarcadero Center
Suite 1500
San Francisco, CA 94111
Tel. (415) 374-2300
Fax (415) 374-2499
michael.shepard@hoganlovells.com

PAUL, WEISS, RIFKIND, WHARTON &
GARRISON LLP
Brad S. Karp (*pro hac vice*)
Bruce Birenboim (*pro hac vice*)
H. Christopher Boehning (*pro hac vice*)
1285 Avenue of the Americas
New York, New York 10019
Tel. (212) 373-3000
Fax (212) 757-3990
bkarp@paulweiss.com
bbirenboim@paulweiss.com
cboehning@paulweiss.com

*Attorneys for Defendant Fédération Internationale de
Football Association*

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION

RACHEL MEHR, et al.,

Plaintiffs

v.

FÉDÉRATION INTERNATIONALE DE
FOOTBALL ASSOCIATION, et al.,

Defendants.

Case No. 4:14-cv-03879-PJH

**STIPULATION AND [PROPOSED]
ORDER RE: TIME FOR DEFENDANTS
TO RESPOND TO COMPLAINT AND
BRIEFING SCHEDULE FOR MOTIONS
TO DISMISS**

1 WHEREAS, on August 27, 2014, Plaintiffs filed a Class Action Complaint;

2 WHEREAS, pursuant to the Stipulation and Order Re: Extension of Time for Certain
3 Defendants to Respond to Complaint, entered on September 19, 2014, Defendants United States
4 Soccer Federation, Inc., US Youth Soccer Association, Inc., National Association of Competitive
5 Soccer Clubs, Inc., California Youth Soccer Association, and American Youth Soccer
6 Association (collectively, the “US Defendants”) have until November 19, 2014 to file their
7 respective responses to the Complaint;

8 WHEREAS, pursuant to the Stipulation and Order Re: Extension of Time for Defendant
9 Fédération Internationale de Football Association to Respond to Complaint, entered on October
10 10, 2014, Defendant Fédération Internationale de Football Association (“FIFA”) has until
11 December 15, 2014 to file its response to the Complaint;

12 WHEREAS, the parties agree that a single date for all Defendants to respond to the
13 Complaint promotes efficiency, and have agreed that all Defendants shall have until December
14 15, 2014 to move, answer, or otherwise respond to the Complaint;

15 WHEREAS, the parties agree that, to the extent any Defendants file motions in lieu of an
16 answer in response to the complaint, Plaintiffs shall file their oppositions to such motions by no
17 later than January 30, 2015, and that all Defendants shall file their replies to Plaintiffs’ oppositions
18 by no later than February 20, 2015;

19 WHEREAS, the parties agree that, given the length and complexity of the Complaint, each
20 of Defendants FIFA and United States Soccer Federation, Inc. shall be limited to a brief of no
21 more than 40 pages in support of any motions in response to the Complaint, and each other
22 Defendant shall be limited to a brief of no more than 25 pages in support of any motions in
23 response to the Complaint. The parties further agree that Plaintiffs shall be entitled to an equal
24 number of pages in opposition to each Defendant’s motion, and that on reply, each of Defendants
25 FIFA and United States Soccer Federation, Inc. shall be limited to no more than 20 pages, and
26 each other Defendant shall be limited to no more than 10 pages.

27 WHEREAS, to the extent Plaintiffs file an omnibus opposition to Defendants’ motions, the
28

1 parties will meet and confer regarding an appropriate page limit for such opposition;

2 NOW, THEREFORE, IT IS HEREBY STIPULATED, by and between the undersigned
3 counsel for the parties, and subject to Court approval, that:

4 (1) All Defendants shall have to and including December 15, 2014, to move, answer
5 or otherwise respond to the Complaint;

6 (2) To the extent any Defendants file motions in lieu of an answer in response to the
7 complaint, Plaintiffs shall file their oppositions to such motions by no later than January 30, 2015,
8 and all Defendants shall file their replies to Plaintiffs' oppositions by no later than February 20,
9 2015;

10 (3) Each of Defendants FIFA and United States Soccer Federation, Inc. shall be
11 limited to a brief of no more than 40 pages in support of any motions in response to the
12 Complaint, and each other Defendant shall be limited to a brief of no more than 25 pages in
13 support of any motions in response to the Complaint. Plaintiffs shall be entitled to an equal
14 number of pages in opposition to each Defendant's motion. On reply, each of Defendants FIFA
15 and United States Soccer Federation, Inc. shall be limited to no more than 20 pages, and each
16 other Defendant shall be limited to no more than 10 pages; and

17 (4) To the extent Plaintiffs file an omnibus opposition to Defendants' motions, the
18 parties will meet and confer regarding an appropriate page limit for such opposition.

19 DATED: November 3, 2014

HAGENS BERMAN SOBOL SHAPIRO LLP

21 By /s/ Steve W. Berman
Steve W. Berman

22 1918 Eighth Avenue, Suite 3300
23 Seattle, WA 98101
24 Phone: (206) 623-7292
25 Fax: (206) 623-0594
Email: steve@hbsslaw.com

26 *Attorneys for Plaintiffs*

1 DATED: November 3, 2014

HOGAN LOVELLS LLP

2
3 By /s/ Michael J. Shepard
Michael J. Shepard

4 3 Embarcadero Center, Suite 1500
5 San Francisco, CA 94111
6 Tel. (415) 374-2300
Fax (415) 374-2499
7 Email: michael.shepard@hoganlovells.com

8 -and-

9 PAUL, WEISS, RIFKIND, WHARTON & GARRISON
LLP

10 Brad S. Karp (*pro hac vice*)
11 Bruce Birenboim (*pro hac vice*)
12 H. Christopher Boehning (*pro hac vice*)
13 1285 Avenue of the Americas
New York, NY 10019
14 (212) 373-3000
bkarp@paulweiss.com
bbirenboim@paulweiss.com
15 cboehning@paulweiss.com

16 *Attorneys for Defendant Fédération Internationale*
17 *de Football Association*

18 DATED: November 3, 2014

LATHAM & WATKINS LLP

19 By /s/ Russell F. Sauer, Jr.
20 Russell F. Sauer, Jr.

21 355 South Grand Avenue
22 Los Angeles, California 90071
Telephone: (213) 485-1234
23 Facsimile: (213) 891-8763
Email: russ.sauer@lw.com

24 *Attorneys for Defendant United States Soccer*
25 *Federation, Inc.*

1 DATED: November 3, 2014

BONNE BRIDGES MUELLER O'KEEFE & NICHOLS

3 By /s/ M. Christopher Hall
M. Christopher Hall

4 1851 East First Street, Suite 810
5 Santa Ana, CA 92705-4041
6 Telephone: (714) 480-2530
7 Facsimile: (714) 480-2585
8 Email: chall@bonnebridges.com

*Attorneys for Defendant United States Youth Soccer
Association, Inc.*

9 DATED: November 3, 2014

GORDON REES SCULLY MANSUKHANI LLP

10 By /s/ Stuart M. Gordon
11 Stuart M. Gordon

12 275 Battery Street, Suite 2000
13 San Francisco, CA 94111
14 Telephone: (415) 986-5900
15 Facsimile: (415) 986-8054
16 Email: sgordon@gordonrees.com

*Attorneys for Defendant American Youth Soccer
Organization and Defendant National Association
of Competitive Soccer Clubs, Inc. d/b/a US Club
Soccer*

17 DATED: November 3, 2014

LYNCH, GILARDI & GRUMMER

19 By /s/ Wallace M. Tice

20 Wallace M. Tice
21 170 Columbus Ave., 5th Floor
22 San Francisco, CA 94133
23 Telephone: (415) 397-2800
24 Facsimile: (415) 397-0937
25 Email: wtice@lgglaw.com

*Attorneys for Defendant California Youth Soccer
Association*

26 Pursuant to Civil Local Rule 5-1(i)(3), the filer attests that concurrence in the filing of
27 this document has been obtained from each of the signatories.
28

[PROPOSED] ORDER

Based on the stipulation of the parties and good cause appearing therefor, it is hereby ordered that:

(1) Defendants Fédération Internationale de Football Association, United States Soccer Federation, Inc., US Youth Soccer Association, Inc., National Association of Competitive Soccer Clubs, Inc., California Youth Soccer Association, and American Youth Soccer Association (collectively, "Defendants") shall have until December 15, 2014 to file their respective responses to the Complaint;

(2) To the extent any Defendants file motions in lieu of an answer in response to the complaint, Plaintiffs shall file their oppositions to such motions by no later than January 30, 2015, and all Defendants shall file their replies to Plaintiffs' oppositions by no later than February 20, 2015;

(3) Each of Defendants FIFA and United States Soccer Federation, Inc. shall be limited to a brief of no more than 40 pages in support of any motions in response to the Complaint, and each other Defendant shall be limited to a brief of no more than 25 pages in support of any motions in response to the Complaint. Plaintiffs shall be entitled to an equal number of pages in opposition to each Defendant's motion. On reply, each of Defendants FIFA and United States Soccer Federation, Inc., shall be limited to no more than 20 pages, and each other Defendant shall be limited to no more than 10 pages; and

(4) To the extent Plaintiffs file an omnibus opposition to Defendants' motions, the parties will meet and confer regarding an appropriate page limit for such opposition.

DATED: _____

HONORABLE PHYLLIS J. HAMILTON
UNITED STATES DISTRICT JUDGE